

Thomas J. Moloney
Jessa DeGroote
CLEARY GOTTlieb STEEN & HAMILTON LLP
One Liberty Plaza
New York, New York 10006
Telephone: 212-225-2000
Facsimile: 212-225-3999

Settlement Date: March 14, 2019
Time: 12:00 p.m.

Objections Due: March 13, 2019
Time: 5:30 p.m.

*Attorneys for HSBC Bank Bermuda Limited
and Craig Perry*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant

No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Debtor.

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff,

Plaintiff,

v.

FEDERICO CERETTI, *et al.*

Defendants.

Adv. Pro. No. 09-01161 (SMB)

**NOTICE OF SETTLEMENT OF COUNTER-PROPOSED
ORDER REGARDING PLAINTIFF'S MOTION FOR THE
ISSUANCE OF A LETTER OF REQUEST CONCERNING THE
EXAMINATION OF NON-PARTY, CRAIG PERRY**

PLEASE TAKE NOTICE that the undersigned counsel, on behalf of Mr. Craig Perry and HSBC Bank Bermuda Limited, respectfully submits this Proposed Order Issuing a Letter of Request for Service Abroad of Judicial or Extrajudicial Documents in Civil or Commercial Matters ("Proposed Order") attaching a Counter-Proposed Letter of Request ("Counter-Proposed Letter of Request"). The Proposed Order, which is identical to the Proposed Order submitted by the Trustee (ECF No. 406-1 Ex. 1), is attached here as Exhibit 1, and the Counter-Proposed Letter of Request is attached thereto as Exhibit A. A comparison of the Counter-Proposed Letter of Request as against the Trustee's proposed Letter of Request (ECF No. 406-1 Ex. A) is attached here as Exhibit 2.

PLEASE TAKE FURTHER NOTICE that the Counter-Proposed Letter of Request was provided to counsel for the Trustee, and the Trustee has consented to the filing of the Counter-Proposed Letter of Request attached as Exhibit A.

Dated: March 13, 2019
New York, New York

Respectfully submitted,

/s/ Thomas J. Moloney
Thomas J. Moloney
(tmoloney@cgsh.com)
Jessa DeGroote
(jdegroote@cgsh.com)
CLEARY GOTTlieb STEEN & HAMILTON LLP
One Liberty Plaza
New York, New York 10006
T: 212-225-2000
F: 212-225-3999

*Attorneys for HSBC Bank Bermuda Limited
and Mr. Craig Perry*